

# EXHIBIT 2

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Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)  
(Admission pending *pro hac vice* application)  
*Attorneys for Plaintiff Lynne Freeman*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x

LYNNE FREEMAN, an individual,

Case No. 1:22-cv-02435-LIS

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,  
an individual, EMILY SYLVAN KIM, an individual,  
PROSPECT AGENCY, LLC, a New Jersey limited  
liability company, ENTANGLED PUBLISHING, LLC, a  
Delaware limited liability company, HOLTZBRINCK  
PUBLISHERS, LLC, D/B/A/ MACMILLAN, a New  
York limited liability company, UNIVERSAL CITY  
STUDIOS, LLC, a Delaware limited liability company,  
CRAZY MAPLE STUDIO, INC, a California corporation

**PLAINTIFF LYNNE  
FREEMAN'S  
INTERROGATORIES TO  
DEFENDANT TRACY  
DEEBS-ELKENANEY  
P/K/A TRACY WOLFF,  
SET SIX**

FAC FILED: May 23, 2022

Defendants.

Ix

x

Propounding Party: Lynne Freeman

Responding Party: Tracy Deebs-Elkenaney p/k/a Tracy Wolff

Set: SIX

Pursuant to Federal Rule of Civil Procedure Rule 33, Plaintiff Lynne Freeman (“Freeman” or “Plaintiff”) requests that Defendant Tracy Deebs-Elkaney p/k/a Tracy Wolff, answer the following interrogatories under oath and serve them upon Plaintiff within 30 days.

### **DEFINITIONS**

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

- a. “YOU” and “YOUR” shall mean defendant Tracy Deebs-Elkaney p/k/a Tracy Wolff.
- b. “ACTION” shall mean this action filed in the United States District Court for the Southern District of New York (Case No. 1:22-cv-02435-AT) entitled Lynne Freeman v. Tracy Deebs-Elkaney p/k/a Tracy Wolff et. al.
- c. “CRAVE BOOK SERIES” shall mean the books entitled Crave, Crush, Covet, Court, Charm and Cherish.
- d. ”BMR” shall mean any and all versions of the manuscript that FREEMAN alleges in the First Amended Complaint filed in the Action that she wrote, including, but not limited to, the versions entitled *Blue Moon Rising* and *Masqued*, and she alleges was infringed by the books in the CRAVE SERIES entitled *Crave*, *Crush*, *Covet* and *Court*.
- e. “COWAN FIRM DEFENDANTS’ ANSWER” shall mean the Answer and Affirmative Defenses of the of Tracy Deebs-Elkaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrink Publishers, LLC, d/b/a Macmillan and Universal City Studios, LLC dated June 27, 2022 filed in this ACTION.

**INTERROGATORIES**

**INTERROGATORY NO. 25:**

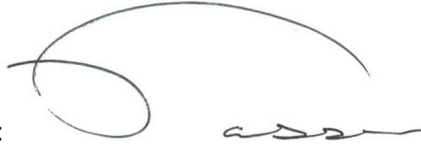
Identify, by manufacture and model number each and every computer YOU used to write or edit any of the books in the CRAVE BOOK SERIES.

**INTERROGATORY NO. 26:**

Identify by manufacture and model number, all editing software YOU used to edit any of the books in the CRAVE BOOK SERIES.

Dated: February 13, 2023

CSReeder, P.C.  
Attorneys for Plaintiff

By: 

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Mark D. Passin  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)

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Main: 212-209-3050  
Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

**PROOF OF SERVICE**

STATE OF CALIFORNIA           )  
COUNTY OF LOS ANGELES    )   ss:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 11766 Wilshire Blvd., Suite 1470, Los Angeles, CA 90025.

On February 13, 2023 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN'S INTERROGATORIES TO TRACY DEEBs-ELKENANEY P/K/A TRACY WOLFF, SET SIX** on the parties in this action listed below as follows:

Nancy Wolff <a href="mailto:nwolff@cdas.com">nwolff@cdas.com</a> CeCe Cole <a href="mailto:ccole@cdas.com">ccole@cdas.com</a> <a href="#">Benjamin Halperin</a> BHalperin@cdas.com Cowan, DeBaets, Abrahams & Sheppard LLP  Dwayne Goetzel <a href="mailto:dgoetzel@intprop.com">dgoetzel@intprop.com</a> Kowert, Hood, Munyon, Rankin & Goetzel	<i>Attorneys for Defendants,</i> TRACY DEEBs-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC
Lacy Herman Koonce, III <a href="mailto:lance.koonce@klarislaw.com">lance.koonce@klarislaw.com</a> Zachary M. Press <a href="mailto:zpress@klarislaw.com">zpress@klarislaw.com</a> Klaris Law	<i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC

☐ **BY MAIL:** By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

☐ **BY OVER NIGHT DELIVERY, VIA FED-EX:** I gave the document(s) to our overnight courier service for delivery to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE, VIA FIRST LEGAL ATTORNEY SERVICE:** I gave said documents to the firm's regular attorney service with specific instructions to be personally delivered by hand to the offices of the addressee, addressed as set forth above.

☐ **BY PERSONAL SERVICE (*Ex Parte*):** I personally delivered by hand to the attorney in attendance on behalf of the above-named counsel at the hearing of \_\_\_\_\_, in Department \_\_\_\_ of the \_\_\_\_\_ Courthouse, \_\_\_\_\_, California.

☒ **BY ELECTRONIC MAIL:** I transmitted said document(s) to the person(s) shown above by electronic mail to the email address shown above.

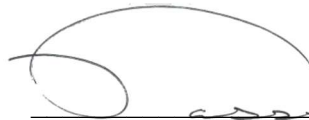
☐ **BY FACSIMILE:** I faxed said document(s) to the addressee, at the specified fax numbers shown above.

☐ **COURTESY COPY BY ELECTRONIC MAIL:** I transmitted courtesy copies of said document(s) to the person(s) shown above by electronic mail to the email address shown above.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on February 13, 2023, at Los Angeles, California.

  
\_\_\_\_\_  
Mark D. Passin

Reitler Kailas & Rosenblatt LLC  
885 Third Avenue, 20th Floor  
New York, New York 10022  
Main: 212-209-3050  
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(Admission pending *pro hac vice* application)  
*Attorneys for Plaintiff Lynne Freeman*

UNITED STATES DISTRICT COURT  
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LYNNE FREEMAN, an individual,

Case No. 1:22-cv-02435-LIS

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,  
an individual, EMILY SYLVAN KIM, an individual,  
PROSPECT AGENCY, LLC, a New Jersey limited  
liability company, ENTANGLED PUBLISHING, LLC, a  
Delaware limited liability company, HOLTZBRINCK  
PUBLISHERS, LLC, D/B/A/ MACMILLAN, a New  
York limited liability company, UNIVERSAL CITY  
STUDIOS, LLC, a Delaware limited liability company,  
CRAZY MAPLE STUDIO, INC, a California corporation

**PLAINTIFF LYNNE  
FREEMAN'S  
INTERROGATORIES TO  
DEFENDANT  
ENTANGLED  
PUBLISHING, LLC, SET  
SIX**

FAC FILED: May 23, 2022

Defendants.

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Propounding Party: Lynne Freeman

Responding Party: Entangled Publishing, LLC

Set: SIX

Pursuant to Federal Rule of Civil Procedure Rule 33, Plaintiff Lynne Freeman (“Freeman” or “Plaintiff”) requests that Defendant Entangled Publishing, LLC, answer the following interrogatories under oath and serve them upon Plaintiff within 30 days.

### **DEFINITIONS**

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- a. “YOU” and “YOUR” shall mean defendant Entangled Publishing, LLC.
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- e. “COWAN FIRM DEFENDANTS’ ANSWER” shall mean the Answer and Affirmative Defenses of the of Tracy Deebs-Elkananey p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrink Publishers, LLC, d/b/a Macmillan and Universal City Studios, LLC dated June 27, 2022 filed in this ACTION.



**INTERROGATORIES**

**INTERROGATORY NO. 25:**

Identify, by manufacture and model number each and every computer used by anyone at Entangled Publishing, LLC, including, but not limited to, Liz Pelletier or Stacy Abrams to write or edit any of the books in the CRAVE BOOK SERIES.

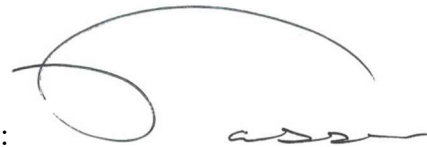
**INTERROGATORY NO. 26:**

Identify by manufacture and model number, all editing software anyone at Entangled Publishing, LLC used to edit any of the books in the CRAVE BOOK SERIES.

Dated: February 13, 2023

CSReeder, P.C.  
Attorneys for Plaintiff

By:



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Mark D. Passin  
11766 Wilshire Blvd., Suite 1470  
Los Angeles, CA 90025  
Telephone: (310) 861-2470  
Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)

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**PROOF OF SERVICE**

STATE OF CALIFORNIA           )  
COUNTY OF LOS ANGELES    )   ss:

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On February 13, 2023 I served the foregoing document described as **PLAINTIFF LYNNE FREEMAN'S INTERROGATORIES TO ENTANGLED PUBLISHING, LLC, SET SIX** on the parties in this action listed below as follows:

Nancy Wolff <a href="mailto:nwolff@cdas.com">nwolff@cdas.com</a> CeCe Cole <a href="mailto:ccole@cdas.com">ccole@cdas.com</a> <a href="mailto:BHalperin@cdas.com">BHalperin@cdas.com</a> Benjamin Halperin Cowan, DeBaets, Abrahams & Sheppard LLP  Dwayne Goetzel <a href="mailto:dgoetzel@intprop.com">dgoetzel@intprop.com</a> Kowert, Hood, Munyon, Rankin & Goetzel	<i>Attorneys for Defendants,</i> TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, ENTANGLED PUBLISHING, LLC, HOLTZBRINCK PUBLISHERS, LLC, D/B/A/ MACMILLAN, UNIVERSAL CITY STUDIOS, LLC
Lacy Herman Koonce, III <a href="mailto:lance.koonce@klarislaw.com">lance.koonce@klarislaw.com</a> Zachary M. Press <a href="mailto:zpress@klarislaw.com">zpress@klarislaw.com</a> Klaris Law	<i>Attorneys for Defendants,</i> EMILY SYLVAN KIM, PROSPECT AGENCY, LLC

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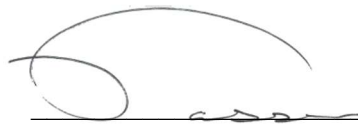
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☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on February 13, 2023, at Los Angeles, California.

  
\_\_\_\_\_  
Mark D. Passin